NO. 234 P. 11/12



## REMARKS

A number of claims were rejected under 35 U.S.C. 112 second paragraph. In response, the Applicant has amended these claims to overcome the Examiner's rejection and therefore requests that the Examiner withdraw the rejection thereof.

Claims 24, 26 – 37 and 39 – 43 have been rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,809,321 issued to Hansen et al (hereinafter *Hansen*) that describes a general purpose, multiple precision parallel operation programmable media processor that incorporates a dedicated execution unit that is used to control the processing of the data. For example, "the general purpose media processor 12, in contrast, handles a data stream of audio, video, graphics, and network information all at the same time with the same processor ...". More particularly, referring to FIG. 7 of Hansen, at column 11 starting at line 51, "one presently preferred embodiment of an integrated general purpose media processor 12 is shown in FIG. 7. The core of the integrated general purpose media processor 12 comprises an execution unit 100. Three main elements or subsections are included in the execution unit 100. A multiple precision arithmetic/logic unit (ALU) 102...a programmable switch 104...and an extended math element 106...". Therefore, the media processor 12 taught by *Hansen* requires a dedicated execution unit whose sole purpose is to provide the abovedescribed functions, and no other.

In contrast to *Hansen*, the invention teaches a system and method of distributed processing of media data using a number of configurable media processing elements (MPEs) where at least one of which is configured to act as a control processing element that controls the distribution of the digital data between some or all of the MPEs, schedule tasks for the MPEs, etc. In this way, each of the distributed MPEs process a selected portion of the digital data in concert with the other MPEs thereby increasing the overall speed and efficiency of the media processing system. More specifically, claim 24 recites,

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receiving the digital data;

determining a digital data format associated with the received digital data; configuring selected ones of a number of configurable media processing elements (MPE) in order to process the digital data in the appropriate format; "dynamically configuring at least one of said configurable MPEs to act, at least in part, as a control processing element suitably arranged to control the distribution of said digital data between some or all of the MPEs, schedule tasks for the MPEs, wherein each of the distributed MPEs process a selected portion of the digital data in concert with the other MPEs thereby increasing the overall speed and efficiency of the media processing system..."

The inventive method provides for no dedicated execution unit (such as the execution unit 100 described above) in so far as any one of the MPEs can be configured to act, at least in part, as a controlling element thereby providing control functions in addition to any data processing functions, if necessary. In this way, the invention provides a configurable system and method that is able to configure itself in order to optimize processing of the data as opposed to Hansen that provides only a dedicated execution unit incapable of being reconfigured as anything but an execution unit.

## CONCLUSION

In view of the foregoing, it is respectfully submitted that all pending claims are allowable. Should the Examiner believe that a further telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted, BEYER WEAVER & THOMAS, LLP

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